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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

| | | |
|---------------------------------|---|--|
| UNITED STATES OF AMERICA, |) | No. CR 16-00440 WHA |
| |) | |
| Plaintiff, |) | UNITED STATES' AMENDED EXHIBIT LIST |
| |) | |
| v. |) | Trial: March 9, 2020 |
| |) | Pretrial Conference: February 19, 2020 |
| YEVGENIY ALEXANDROVICH NIKULIN, |) | Time: 1:30 p.m. |
| |) | Courtroom No. 12 |
| Defendant. |) | |
| |) | |
| |) | |

The United States respectfully submits the attached exhibit list, which includes exhibits that the United States presently intends to introduce in its case-in-chief. This list is intended to be inclusive and is subject to amendment or supplementation as trial preparations progress. In addition, the list contains items, such as Reports of Investigation, that the United States does not intend to introduce in its case-in-chief, but that have been included here with exhibit numbers to reduce confusion should they need to be identified during trial. The government will notify the defense and Court of any changes to this list.

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| Exh. No. | Date | | Sponsoring Witness(es) | Description | Beg. Bates | End Bates |
|----------|---------------------------|------------------------|------------------------|---|------------|------------|
| | Marked for Identification | Admitted into Evidence | | | | |
| 1 | | | | CD: Google search warrant results for chinabig01@gmail.com (August 29, 2012) | YN000002 | |
| 2 | | | | Certificate of authenticity for Google search warrant results, August 29, 2012 | YN001674 | |
| 3 | | | | Email messages from chinabig01@gmail.com account (from Exhibit 1) | YN001693 | YN001743 |
| 4 | | | | CD: Search Warrant results for Dropbox account associated with chinabig01@gmail.com | YN000004 | |
| 5 | | | | InsidePro.com screenshots re dwdm | YN000063 | YN000066 |
| 6 | | | | InsidePro.com screenshots re slavuti4 | YN004642 | YN004643 |
| 7 | | | | Forensic image of iMac computer | YN006683 | |
| 8 | | | | “.bash_history” file from iMac computer | YN000262 | YN000275 |
| 9 | | | | Logs (secure.log, secure.log.0bz2, secure.log.1.bz2) from iMac computer | YN000276 | YN001631 |
| 10 | | | | Duplicate – Intentionally left blank | | |
| 11 | | | | CD containing results of Skype search warrant for account dex.007 | YN003409 | |
| 12 | | | | Excerpts from response to Skype search warrant for account dex.007 | YN003411-A | YN003411-D |
| 13 | | | | Certificate of authenticity for Skype search warrant results | YN003412 | |
| 14 | | | | Google subscriber information for chinabig01@gmail.com (July 14, 2016) | YN003437 | |
| 15 | | | | Certificate of authenticity for Google records (July 14, 2016) | YN003440 | |

| Exh. No. | Date | | Sponsoring Witness(es) | Description | Beg. Bates | End Bates |
|----------|---------------------------|------------------------|------------------------|--|------------|-----------|
| | Marked for Identification | Admitted into Evidence | | | | |
| 16 | | | | Automatic intrusion logs | YN004640 | |
| 17 | | | | Excerpts of Automatic intrusion logs | | |
| 18 | | | | Formspring logs | YN004671 | YN004772 |
| 19 | | | | Excerpts of Formspring logs | | |
| 20 | | | | Microsoft search warrant results for fyofyofyo@hotmail.com account | YN015024 | |
| 21 | | | | Excerpt – Email messages from search warrant results for fyofyofyo@hotmail.com account (messages with ibo ibo and moy.yawik) | | |
| 22 | | | | Translation of email messages between fyofyofyo@hotmail.com and “ibo ibo” (French-English.) | YN004788 | YN004813 |
| 23 | | | | Google subscriber information for account udalite@gmail.com (August 2015) | YN004955 | YN004960 |
| 24 | | | | Certificate of authenticity for Google subscriber records (udalite@gmail.com) | YN004963 | |
| 25 | | | | Western Union records (Excel files) | YN005009 | |
| 26 | | | | External hard drive containing LinkedIn VPN and SSH system logs | YN005014 | |
| 27 | | | | Excerpts of LinkedIn VPN logs | | |
| 28 | | | | Excerpts of LinkedIn SSH logs | | |

| Exh. No. | Date | | Sponsoring Witness(es) | Description | Beg. Bates | End Bates |
|----------|---------------------------|------------------------|------------------------|---|------------|-----------|
| | Marked for Identification | Admitted into Evidence | | | | |
| 29 | | | | USB drive: Google search warrant results for udalite@gmail.com account (September 2013) | YN006282 | |
| 30 | | | | Certificate of authenticity for Google search warrant results, udalite@gmail.com | YN006284 | |
| 31 | | | | Excerpt – email messages from udalite@gmail.com account | | |
| 32 | | | | Account list from LinkedIn (Excel file) | YN006743 | |
| 33 | | | | LinkedIn log for user nberry (Excel file) | YN006745 | |
| 34 | | | | Certificate of authenticity for Google subscriber records (August 20, 2012) | YN006790 | |
| 35 | | | | Google subscriber records for chinabig01@gmail.com (August 20, 2012) | YN006791 | |
| 36 | | | | Microsoft subscriber records for chinabig01@gmail.com | YN006802 | YN006803 |
| 37 | | | | Certificate of authenticity for Microsoft records | YN006804 | |
| 38 | | | | Dropbox subscriber records for chinabig01@gmail.com | YN006809 | YN006914 |
| 39 | | | | Google subscriber records for chinabig02@gmail.com | YN006823 | |
| 40 | | | | Certificate of authenticity for Google subscriber records (chinabig02@gmail.com) | YN006822 | |
| 41 | | | | Google subscriber records for chinabig01@gmail.com (November 6, 2012) | YN006843 | |
| 42 | | | | Certificate of authenticity for Google records (November 6, 2012) | YN006842 | |

| Exh. No. | Date | | Sponsoring Witness(es) | Description | Beg. Bates | End Bates |
|----------|---------------------------|------------------------|------------------------|---|------------|-----------|
| | Marked for Identification | Admitted into Evidence | | | | |
| 43 | | | | Certificate of authenticity for Afraid.org records | YN007069 | |
| 44 | | | | Afraid.org records (Zip file) | YN007070 | |
| 45 | | | | Afraid.org Records | YN013363 | YN013371 |
| 46 | | | | Certificate of authenticity for Google subscriber records (Google Plus ID 104244780492105546023) | YN007087 | |
| 47 | | | | Google subscriber records for Google Plus ID 104244780492105546023 | YN007088 | |
| 48 | | | | Kongregate subscriber records | YN007768 | YN007769 |
| 49 | | | | Google subscriber records for moy.yawik | YN012045 | YN012051 |
| 50 | | | | Certificate of authenticity for Google subscriber records (moy.yawik) | YN012044 | |
| 51 | | | | Skype subscriber records for valeriy.krutov3 | YN012181 | YN012182 |
| 52 | | | | Google subscriber records for chinabig01@googlemail.com (December 4, 2014) | YN012971 | |
| 53 | | | | Certificate of authenticity for Google records (December 4, 2014) | YN012973 | |
| 54 | | | | Google subscriber records for chinabig01@googlemail.com (July 2015) | YN012976 | |
| 55 | | | | Certificate of authenticity for Google records | YN012979 | |
| 56 | | | | Skype subscriber records for dex.007 | YN012984 | YN012985 |
| 57 | | | | Paypal subscriber records for 8bit-man@mail.ru | YN013009 | YN013014 |

| Exh. No. | Date | | Sponsoring Witness(es) | Description | Beg. Bates | End Bates |
|----------|---------------------------|------------------------|------------------------|---|------------|-----------|
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| 58 | | | | Instagram subscriber records for i.tak.soidet (October 2016) | YN013018 | YN013019 |
| 59 | | | | Copy of Defendant's passport | YN013034 | |
| 60 | | | | Records provided by defendant | YN014641 | YN014660 |
| 61 | | | | Translation of records provided by defendant | YN015025 | YN015029 |
| 62 | | | | Google search warrant results for chinabig01@gmail.com account (2019) | YN014814 | |
| 63 | | | | Document custodian certification for Google search warrant results (2019) | YN014814 | |
| 64 | | | | Response to MLAT request to Ukraine | YN014838 | YN014855 |
| 65 | | | | English translation of response to MLAT request to Ukraine | YN014820 | YN014837 |
| 66 | | | | Drive: Forensic image of computer of Oleksander Ieremenko | YN014124 | YN014125 |
| 67 | | | | CDs: FTK forensic report re computer of Oleksander Ieremenko | YN014111 | YN014112 |
| 68 | | | | Magnet Forensic report of Skype chats between dex.007 and vaiobro | YN003368 | YN003374 |
| 69 | | | | Translation notes for Skype chats | YN003376 | YN003378 |
| 70 | | | | Translation of Skype chats (Excel file) | YN003378-A | |
| 71 | | | | Photographs from computer of Oleksander Ieremenko | YN014101 | YN014110 |
| 72 | | | | Video clip from computer of Oleksander Ieremenko | YN014096 | |
| 73 | | | | Translation of video clip YN014096 | YN015054 | |

| Exh. No. | Date | | Sponsoring Witness(es) | Description | Beg. Bates | End Bates |
|----------|---------------------------|------------------------|------------------------|---|------------|-----------|
| | Marked for Identification | Admitted into Evidence | | | | |
| 74 | | | | Video clip from computer of Oleksander Ieremenko | YN014097 | |
| 75 | | | | Translation of video clip YN014097 | YN015055 | |
| 76 | | | | Original images of Skype chats from computer of Oleksander Ieremenko | YN014082 | YN014087 |
| 77 | | | | Skype contact list from computer of Oleksander Ieremenko | YN014088 | |
| 78 | | | | Skype log from computer of Oleksander Ieremenko | YN014089 | |
| 79 | | | | Response to MLAT Request to Russian Federation, January 28, 2013 | YN003252 | YN003265 |
| 80 | | | | Response to MLAT Request to Russian Federation, October 30, 2013 | YN001901 | YN001918 |
| 81 | | | | Certificate of authenticity for response to MLAT request to Russian Federation | YN001913 | |
| 82 | | | | Response to MLAT Request to Russian Federation, October 30, 2013 | YN000216 | YN000234 |
| 83 | | | | Certificate of authenticity for response to MLAT request to Russian Federation | YN000228 | |
| 84 | | | | English Translation of response to MLAT request to Russian Federation, translated February 19, 2014 | YN003124 | YN003133 |
| 85 | | | | Response to MLAT Request to Russian Federation, March 28, 2016 | YN003446 | YN003464 |
| 86 | | | | Certificate of authenticity for MLAT response from the Authority of the Russian Federation | YN003459 | |

| Exh. No. | Date | | Sponsoring Witness(es) | Description | Beg. Bates | End Bates |
|----------|---------------------------|------------------------|------------------------|--|------------|-----------|
| | Marked for Identification | Admitted into Evidence | | | | |
| 87 | | | | CD: Defendant's recorded calls, files 174_37, 159_924, 194_513 | YN014139 | |
| 88 | | | | Translation/excerpt of defendant's call 174.37 | YN015030 | YN015038 |
| 89 | | | | Translation/excerpt of defendant's call 159.924 | YN015039 | YN015044 |
| 90 | | | | Translation/excerpt of defendant's call 194.513 | YN015045 | YN015049 |
| 91 | | | | CD: Defendant's recorded calls, file 169.194 | YN014211 | |
| 92 | | | | Translation/excerpt of defendant's call 169.194 | YN015050 | YN015053 |
| 93 | | | | Report of Sasha Usenko (LinkedIn Security Architect) interview, 6/6/2012 | YN000037 | |
| 94 | | | | Report of Nick Berry (LinkedIn) interview, 6/20/2012 | YN000237 | YN000239 |
| 95 | | | | Report of Ganesh Krishnan (LinkedIn) interview, 6/19/2012 | YN000240 | YN000242 |
| 96 | | | | Report of Nick Berry (LinkedIn) interview, 7/5/2012 | YN0001653 | YN001654 |
| 97 | | | | Drive: Forensic image of laptop computer | YN001655 | |
| 98 | | | | Report of Cory Louie (Dropbox) Interview, 9/11/2012 | YN001746 | YN001747 |
| 99 | | | | Report of Barry Abrahamson telephone interview, 8/15/13 | YN004597 | |
| 100 | | | | Report of Barry Abrahamson telephone interview, 8/8/13 | YN004598 | YN004599 |
| 101 | | | | Report of Ade Olonoh interview, 7/12/2012 | YN004644 | YN004645 |
| 102 | | | | Email from Matt Cudworth dated 1/8/2014 | YN004824 | |

| Exh. No. | Date | | Sponsoring Witness(es) | Description | Beg. Bates | End Bates |
|----------|---------------------------|------------------------|------------------------|---|------------|-----------|
| | Marked for Identification | Admitted into Evidence | | | | |
| 103 | | | | Email from Ade Olonoh re servers | YN004970 | |
| 104 | | | | Email from Matt Cudworth | YN004973 | |
| 105 | | | | Hostgator records | YN007075 | YN007076 |
| 106 | | | | Google subscriber records (ittagheuer@gmail.com) | YN012219 | |
| 107 | | | | Certificate of authenticity for Google records | YN012221 | |
| 108 | | | | MyFitnessPal records | YN012231 | |
| 109 | | | | Certificate of authenticity for MyFitnessPal records | YN012232 | |
| 110 | | | | Certificate of authenticity for Yelp records | YN012264 | |
| 111 | | | | Yelp subscriber records | YN012263 | |
| 112 | | | | Report of Interview of Alex Kuznetsov | YN014451 | YN014452 |
| 113 | | | | Vimeo subscriber records for chinabig01@gmail.com | YN012235 | |
| 114 | | | | Comcast subscriber records for 24.18.183.27 | YN012763 | |
| 115 | | | | Certificate of authenticity for Comcast records | YN012764 | |
| 116 | | | | Google search warrant results for chinabig01@gmail.com (November 2013) | YN013542 | |
| 117 | | | | IP logs from Google search warrant results | YN001921 | YN001952 |
| 118 | | | | Excerpt of results of 2019 search warrant to Google for chinabig01@gmail.com account (YN014814) | YN015056 | YN015062 |

| Exh. No. | Date | | Sponsoring Witness(es) | Description | Beg. Bates | End Bates |
|----------|---------------------------|------------------------|------------------------|--|------------|-----------|
| | Marked for Identification | Admitted into Evidence | | | | |
| 119 | | | | Translation of search warrant result excerpts | YN015063 | YN015069 |
| 120 | | | | Translation of email messages between fyofyofyo@hotmail.com and moy.yawik@gmail.com (Russian-English) (Complete translation at YN015677) | YN000202 | |
| 121 | | | | Instagram subscriber records (February 2019) for i.tak.soidet | YN015141 | YN015217 |
| 122 | | | | Report of Bruno Connelly (LinkedIn) Interview | YN015858 | YN015860 |
| 123 | | | | Certificate of authenticity for Instagram subscriber records (i.tak.soidet) (Exh. 58) | YN016050 | |
| 124 | | | | Summary of chinabig01@gmail.com account logins | | |
| 125 | | | | Google subscriber records for chinabig01@gmail.com (from Exhibit 1) | | |
| 126 | | | | Dropbox subscriber records for chinabig01@gmail.com (from Exhibit 4) | | |
| 127 | | | | Dropbox login records for chinabig01@gmail.com (from Exhibit 4) | | |
| 128 | | | | Attachment to translated email from fyofyofyo@hotmail.com search warrant results (from Exhibit 20) | | |
| 129 | | | | Microsoft subscriber information for fyofyofyo@hotmail.com (from Exhibit 20) | | |
| 130 | | | | Excerpts from udalite@gmail.com search warrant results (from Exhibit 29) | | |

| Exh. No. | Date | | Sponsoring Witness(es) | Description | Beg. Bates | End Bates |
|----------|---------------------------|------------------------|------------------------|---|------------|-----------|
| | Marked for Identification | Admitted into Evidence | | | | |
| 131 | | | | Summary chart of logs from N. Berry computer (from Exhibit 7) | | |
| 132 | | | | CD: Defendant's recorded calls 20821178 20821234, 20960956, 21172516 | YN014856 | YN014856 |
| 133 | | | | Translation/excerpt of defendant's call no. 20821178 | YN016285 | YN016293 |
| 134 | | | | Translation/excerpt of defendant's call call no. 20821234 | YN016294 | YN016299 |
| 135 | | | | Translation/excerpt of defendant's call no. 20960956 | YN016300 | YN016301 |
| 136 | | | | Translation/excerpt of defendant's call no. 21172516 | YN016302 | YN016308 |
| 137 | | | | Certificate of authenticity for Kongregate records (Exh. 48) | YN016310 | YN016310 |
| 138 | | | | Certificate of authenticity for Vimeo records (Exh. 113) | YN016315 | YN016315 |
| 139 | | | | Certificate of authenticity for PayPal records (Exh. 57) | YN016320 | YN016321 |
| 140 | | | | Certificate of authenticity for Western Union records (Exh. 25) | YN016325 | YN016325 |
| 141 | | | | Certificate of authenticity for Instagram (Facebook) records (Exh. 121) | YN016364 | YN016364 |

| | | | | | | |
|-----|--|--|--|---|----------|----------|
| 142 | | | | Dropbox IP log | YN016428 | YN016430 |
| 143 | | | | CD: Google search warrant results for r00talka@gmail.com (February 2020) | | |

DATED: February 18, 2020

Respectfully submitted,

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/s/
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